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ORIGINAL

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May 12, 1998

**VIA MESSENGER**

Magalie Roman Salas, Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Re: Comments of Pharis Broadcasting, Inc.

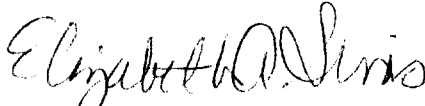
Stop Code: 1170

Dear Ms. Salas:

Transmitted herewith on behalf of Pharis Broadcasting, Inc., licensee of low power television stations KPBI-LP and KFDF-LP, Fort Smith, Arkansas, K15DR, Springdale, Arkansas, K63EG, Winslow, Arkansas, K60EP, Magazine Mountain, Arkansas, K69HN and K36EA, Fayetteville, Arkansas, K50CO, Poteau, Oklahoma, K59ES, Hindsville, Arkansas, K14BT, Bentonville, Arkansas, and K27DI, Fort Smith, Arkansas, are an original and nine copies of the Comments of Pharis Broadcasting, Inc., in support of the Class A status proposed by the Community Broadcasters Association in RM-9260.

Should you have any questions regarding this filing, please contact the undersigned.

Very truly yours,

  
Elizabeth A. Sims

Enclosures

1170  
CODE  
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HMB

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of )  
Advanced Television Systems and )  
Their impact upon the Existing )  
Television Broadcast Service )

RM -9260

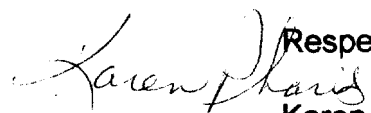
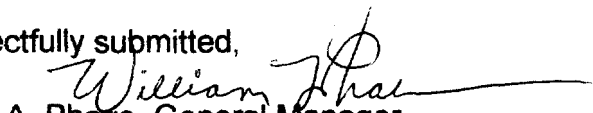
Comments on the CBA Petition for Rule Making

Pharis Broadcasting, Inc., wholeheartedly supports the Community Broadcasters Association (CBA) request for the creation of a new "Class A" television station classification. Pharis operates ten LPTVs in the Fort Smith/Fayetteville/Springdale/Rogers, Arkansas, Nielsen market. Eight operate as KPBI-LP, an affiliate of the Fox Broadcasting Company, and two operate as KFDF-LP, an affiliate of the United-Paramount Network. These stations presently offer 7-1/2 hours per week of public service, news, weather and sports programming which is produced and broadcast live from our main studios. KPBI-LP has been on the air almost nine years and is highly competitive with the three full powers in the market during fringe, access, prime and sports programming, including exclusive rights to Arkansas Razorbacks Network Basketball.

The recent DTV allotment and the elimination of channels 60-69 for LPTV will most certainly result in channel changes for at least eight of our ten stations. Though this will be an expensive proposition and will require major promotion to help our viewers find us on new channels, we are more than willing to do this to expedite DTV because we believe LPTV can be a vital part of digital television's future. However, LPTV stations such as ours that are locally-operated with local interests at heart, must be relieved of the secondary status that threatens us with having to change frequencies again and again until eventually there are no frequencies left or our capital is exhausted.

LPTV operators such as ourselves mostly use our own resources because our licenses are second class to everyone else's, making lenders skittish. The reason Pharis Broadcasting, Inc., has succeeded thus far is that we have made the leap of faith, hired the additional people needed to provide more local programming, bought professional quality equipment, and signed the longterm contracts common to television. In essence, we have been crawling further out onto a limb that could be sawed off at any moment, leaving our viewers without important, local service and leaving us wondering why the Commission would establish a new industry, watch it begin to thrive and then abandon it.

We urge the Commission to support this Rulemaking as amended.

Respectfully submitted,  
   
Karen A. Pharis, General Manager  
William L. Pharis, President